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October 19, 2022

VIA ECF

Hon. Jesse M. Furman United States District Judge United States District Court Southern District of New York 40 Centre Street, Room 2202 New York, NY 10007

Re: Fora Financial Holdings, LLC v. New York Tribeca Group, LLC et al.,

Case No. 22-cv-8539-JMF; Status Update

Dear Judge Furman:

This firm represents plaintiff Fora Financial Holdings, LLC ("Fora Financial") in this matter. We write with the consent of counsel for defendant New York Tribeca Group, LLC ("Tribeca") to submit a status update on the parties' negotiations before tomorrow's teleconference with the Court. Since the last conference, the parties have been negotiating a proposed order that allows for the completion of some expedited discovery while Tribeca refrains from using or disclosing certain information, as well as a potential settlement of the lawsuit. The parties are continuing to negotiate those issues but have not yet reached a formal agreement.

Respectfully submitted,

s/ Jeffrey S. Kramer

Jeffrey S. Kramer (JK1019)

cc: Irena Zolotova, Esq. Counsel for Defendant By Email

All Other Counsel by ECF

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